

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

**CHASE DEAKLE and ROBERT
STEPHENS, individually and on behalf of
all others similarly situated,**

Plaintiffs,

v.

GRAYSON AIR CONDITIONING, INC.

Defendant.

**CIVIL ACTION NO.:
1-22-CV-00476**

PARTIES' JOINT STATUS REPORT

COME NOW Plaintiffs Chase Deakle, Robert Stephens, and Richard Perry ("Plaintiffs") and Defendant Grayson Air Conditioning, Inc. ("Defendant") (collectively "the Parties"), by and through undersigned counsel, and in compliance with the Court's April 10, 2023 Order (Doc. 26), file their joint status report setting out the status of settlement. The Parties state as follows:

1. Since the Court's April 10, 2023 Order, the Parties have engaged in meaningful and productive settlement discussions, including the exchanging of offers and proposals. Because this matter deals with an alleged violation of the Fair Labor Standards Act ("FLSA"), the Parties have narrowed their conversations to monetary damages and the calculations concerning the same.

2. On May 3, 2023, Plaintiffs filed a Consent to Join on behalf of Richard Perry. *See* PageID # 78.

3. The Parties have met and conferred regarding settlement negotiations, and will continue to do so, hopefully achieving a resolution soon. The Parties are continuing to narrow the gap between their positions.

4. Furthermore, on or about June 1, 2023, Defendant's lead counsel left the Firm and asked the Court to accept his withdrawal, (PageID # 79), which the Court granted on June 5, 2023. *See* PageID # 80.

5. For the preceding reasons, the Parties respectfully request the Court to stay the proceedings for an additional forty-five (45) days, at which point the Parties will again provide the Court with the status of settlement negotiations. If the Parties resolve this matter in the interim, they will immediately notify the Court.

6. The additional stay would allow the Parties to preserve financial resources and will promote judicial economy, thereby promoting a resolution.

7. Plaintiffs' counsel has authorized the undersigned to affix his electronic signature for filing purposes.

WHEREFORE, PREMISES CONSIDERED, the Parties respectfully request the Court to enter an Order staying this matter for an additional forty-five (45) days to allow the Parties time to meet and confer, and if not resolved after forty-five (45) days, allowing the Parties to submit a Joint Status Report, notifying the Court of their progress. If the Parties resolve this matter within forty-five (45) days, they will promptly inform the Court.

Respectfully submitted,

**CHASE DEAKLE and ROBERT
STEPHENS, Each Individually and on
Behalf of All Others
Similarly Situated, PLAINTIFFS**

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/s/ Colby Qualls (by permission)

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/s/ Caleb W. Diaz

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CERTIFICATE OF SERVICE

I hereby certify that on June 5, 2023, a true and correct copy of the foregoing was filed on CM/ECF and electronically served upon the following counsel of record:

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